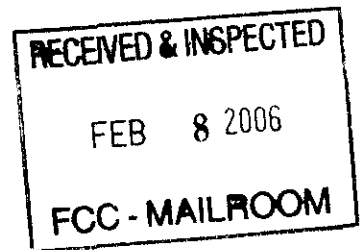


S & B
PRODUCTIONS

January 20, 2006



Amelia Brown, Disability Rights Office
Federal Communications Commission
445 12th Street SW
Washington D.C. 20554

Attention: Closed Captioning Petition For Exemption (reference: CGB-CC-0012)

Dear Ms. Brown,

Here is the additional information you requested (in your letter dated December 22, 2005) in our petition for an exemption from closed captioning for our television program. We believe supplying captions would result in an undue burden.

To review, we produce a weekly half-hour talk show called "Reno's Backstage Pass" highlighting entertainment in the Reno area for that particular weekend. It is a hobby mostly for fun, and as you will see, very little profit. We've been doing this program the same way since September, 1995.

Because we have to wait for many of the entertainers to get to Reno, We videotape and edit the program on Wednesdays. We ship or deliver it to the two stations so they can review it and place it in their systems on Thursday. It airs Friday mornings on KOLO-TV in Reno and KSPX-TV in Sacramento. The program has no repeat value, because the information and interviews contained in the program are for that weekend and become immediately outdated.

Supplying captions would result in undue burden in two ways:

- (1) LOGISTIC: We would not be able to get the captions on the program and delivered to the stations in time. We can send it overnight to the caption company on Wednesday. The caption company could do the work and send it back out to the stations on Thursday. But, of course, it would not arrive at the stations until Friday morning. It would be too late for the stations to review the program before airing. And, that assumes no glitches (weather, machines malfunctions, etc.) in any step of the process.

S & B PRODUCTIONS

- (2) FINANCIAL: We are a very small budget, local show. I am the host, producer AND editor. Considering the small amount of gross revenue, combined with all of our expenses and tight deadlines from taping to airing, we believe supplying captions would result in an undue burden:
(see A,B,C,D attached)

Weekly Sponsor Income: \$1,250.00

Weekly Expenses:

KOLO-TV air time:	\$400.00 (A)
KSPX-TV air time:	450.00 (B)
Production costs:	127.00 (C)
Tapes, shipping	75.00
TOTAL:	\$1,052.00

Weekly Profit (before captions): \$ 198.00

Cost Of Captioning: (lowest estimate: D)

Captioning:	\$ 185.00
Master Tape:	75.00
2 dubs	50.00
Shipping:	50.00
TOTAL:	360.00

TOTAL WEEKLY LOSS: -\$162.00

As you can see, even if we adjust our taping and/or air dates, our small program just cannot afford the expense of supplying captions. Therefore, we respectfully request an exemption from closed captioning.

If you need any more information, please feel free to contact me.

Thank you for your time and attention.

Bruce Jakubowski

S & B Productions
3417 Ridgcrest Dr.
Reno, NV 89512

Phone: (775) 674-3195 fax: (775) 674-1817

3417 Ridgcrest Drive • Reno, Nevada 89512
Phone: (775) 674-3195 • Fax: (775) 674-1817



4850 Ampere Drive
Post Office Box 10000
Reno, NV 89510-0005
Phone: 775-858-8888 Fax: 775-858-8855

206980
BACKSTAGE PASS
S & B PRODUCTIONS
3417 RIDGECREST DRIVE
RENO NV 89512

REP...
SLSP: LAURA BOREN
ADV: BACKSTAGE PASS
PROD: S & B PROD/

DATE 12/25/05 6980-00034

ORDER TYPE		STANDARD	
INVOICE NO.		PAGE	BROADCAST MONTH
51210139		4	DECEMBER
SCHEDULE DATES		CONTRACT YEAR	
12/27/04-12/23/05			
BILLING INSTRUCTIONS			
STANDARD BROADCAST CALENDAR			

REF#:
DESC:

SCHEDULE				ACTUAL BROADCAST							RECONCILIATION	
DESCRIPTION	PRICE	RT/SS#	PER	DATE	DAY	TIME	LENGTH	M/G FOR	PRODUCT DESCRIPTION	PRICE	REMARKS	DR/CR
130-12P	400.00	4	4	12/21	WE	02:59P	:10		AIRS 12/23 & 12/30	.00		
				12/22	TH	02:34P	:10		AIRS 12/23 & 12/30	.00		
				12/22	TH		:10		AIRS 12/23 & 12/30	.00	NOT AVAILA	
				12/23	FR		:10		AIRS 12/23 & 12/30	.00	PRE/NO MG	
				12/23	FR	12:00A	:10		AIRS 12/23 & 12/30	.00	NOT AVAILA	
				12/02	FR	11:30A				400.00	PRE/NO MG	
				12/09	FR	11:30A				400.00		
				12/16	FR	11:30A				400.00		
				12/23	FR	11:30A				400.00		
PERIOD COST			We warrant that the actual broadcast information shown on this invoice was taken from the program log.							18 TOTAL UNITS		
PER CONFIRMATION												
1,600.00			ACTUAL GROSS BILLING							1,600.00	SUB-TOTALS	
			AGENCY COMMISSION							.00	Credits	
			NET DUE							1,600.00	TOTAL RECONCILING	
											ITEMS	
											.00	

**New Day**
MARKETING923 Olive Street
Santa Barbara, CA 93101
805-965-7833 fax: 805-965-1284**Schedule for S & B Productions (SBP)**

1/9/2006

Refer to Inv. # 9325

<u>Station</u>	<u>Market</u>	<u>Day</u>	<u>Date</u>	<u>Time</u>	<u>Client Cost</u>	<u>Title</u>	<u>AE</u>
✓ KSPX	Sacramento, CA	Fri	1/27/06	10:30 am	\$450.00	Reno Backstage Pass #536	BE
Daily Subtotal:					\$450.00		
Weekly Subtotal:					\$450.00		

13



4850 Ampere Drive
Post Office Box 10000
Reno, NV 89510-0005
Phone: 775-858-8888 Fax: 775-858-8855

100210
S & B ADVERTISING AGENCY
3417 RIDGECREST DRIVE
RENO NV 89512

INV : 51220497

DATE: 12/25/05

PAGE: 1

SPON: BACKSTAGE PASS

PROD: S & B PROD/PROD

PER : 11/06/02 - T.F.N.

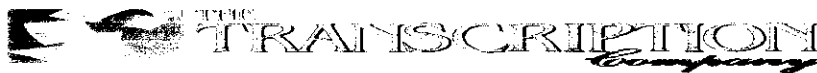
CONT: 6980-00030 STANDARD

SLSP: LAURA BOREN

EST#:

DATE	DESCRIPTION	EXTENSION
12/30/05	LOCAL AGENCY PRODUCTION REV DECEMBER PRODUCTION PROD INV 3523	602100 1 @ 150.00 150.00

GROSS INVOICE AMOUNT	150.00
LESS AGENCY COMMISSION	22.50
NET INVOICE AMOUNT DUE	127.50



4100 W. Burbank Blvd 3rd Floor Burbank CA 91505 (818) 848-6500 FAX: (818) 450-0516

TM

CONFIDENTIAL PROPOSAL
For
TRANSCRIPTION & CAPTION SERVICES
Prepared for
SNB PRODUCTIONS
January 5, 2006

CLOSED CAPTIONING

Standard Roll-Up-format

\$185.00 per 30 minutes
\$350.00 per 60 minutes
\$585.00 per 90 minutes

*(Includes Electronic Delivery of
Scripts & cc files on disk)*

ADDITIONAL CHARGES:

- Master Beta Cam

\$75/ per 30 minutes

Closed Caption Encoding and Conversion

Dubbing

\$25.00 per Tape

Total Cost Per 30 minute program: \$285 each

• **REAL-TIME CAPTIONING**

Closed Caption Service for Broadcast – Real-time

\$100.00 per hour

Includes: News, Sports, Kids and Telethons

Segment Cut-in

\$50.00 per each

Segments 30 minute or less

OTHER AVAILABLE SERVICES:

- Language Translation of transcripts
- Subtitles
- CD and DVD media duplication
- FTP site and digital file transfer for media content

Prices effective through December 31, 2006

Roni Hall

Sales Consultant

The Transcription Company

rhall@transcripts.net

818-848-6500 x111

AFFIDAVIT OF BRUCE JAKUBOWSKI


STATE OF NEVADA)
)ss.
COUNTY OF WASHOE)

BRUCE JAKUBOWSKI, of Reno, Nevada, being first duly sworn,
deposes and says:

(1) That he has prepared the foregoing letter from *S & B Productions*, dated January 20, 2006, addressed to the *Federal Communications Commission* and knows the contents thereof, including Exhibits A, B, C and D; and the same is true of his own knowledge, except as to those matters therein stated on information and belief, and as to those matters he believes it to be true.

(2) That said documents (a) are in accordance with the books and records of affiant; (b) are complete and correct in all material respects; (c) fairly represent the financial condition of *S & B Productions* at the respective dates therein indicated; and (d) have been prepared in accordance with accounting principles applied on a consistent basis with prior years.

DATED this 27 day of January, 2006.



BRUCE JAKUBOWSKI

SUBSCRIBED and SWORN to before me
this 27th day of January, 2006.



Notary Public

